

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

GREG E. LINDBERG,

Plaintiff,

- against -

RONALD CIEUTAT, TODD VEREEN, DAVID
GLENN FINNEGAN, FLOYD SLAY, JR.,
TIMOTHY ANDREWS, TYLA FOWLKES,
DEBRA LITTLE, THOMAS WILLIAMS, ERIN
ANDERSON, JAN WHEELER, EUGENE
DREHER, IV, NANCY DREHER, JOSEPH
MOORE, PHILLIP EPSTEIN, MICHAEL
DANDURAND, WILLIAM MCFARLAND,
ANGELA CLARK, CAROL REED, and
MICHAEL RUDGE,

Defendants.

Civil Action No. 1:25cv1000 (ER)

NOTICE OF RESPONDENT RONALD CIEUTAT'S MOTION TO DISMISS

PLEASE TAKE NOTICE that, upon the declaration of Brian M. Burnovski, dated March 26, 2025, the exhibits attached thereto, and the accompanying memorandum of law, Defendant Ronald Cieutat ("Defendant"), by and through the undersigned counsel, hereby moves this Court, before the Honorable Edgardo Ramos, United States District Judge at the United States District Court for the Southern District of New York, located at 40 Foley Square, New York, New York 10007, on a date and time to be set by the Court, for an order dismissing with prejudice the Verified Petition to Compel Arbitration and Stay All Court Proceedings (Doc. 1) pursuant to Rules 12(b)(2), 12(b)(5) and 12(b)(6) of the Federal Rules of Civil Procedure, as well as for such other and further relief that this Court deems just and proper.

Dated: New York, New York
March 26, 2025

DAVIS POLK & WARDWELL LLP

By: /s/ Brian M. Burnovski

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